

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: ERICA C. ECKMAN : CHAPTER 13  
:   
DEBTORS : CASE NO. 15-13567 SR

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**DEBTOR'S ANSWER TO  
MOTION OF NATIONSRAR MORTGAGE, LLC FOR RELIEF FROM STAY**

1. Admitted. By way of further answer, Movant is not the owner of the mortgage and therefore has no standing.

2. Admitted.

3. Denied.

4. Admitted.

5. Admitted.

6. Denied.

7. Denied. By way of further answer the fees pled are excessive.

8. Denied.

9. Denied.

10. Denied.

11. Denied as a request for declaratory prospective relief.

12. Admitted that documents are attached; the efficacy of such is denied with strict proof demanded.

Respectfully Submitted:

/s/ Joseph F. Claffy, Esq

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